

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA	:	13-CR-461 (SJ)
v.	:	
MARLENY AMPARO TORRES	:	October 10, 2014

MOTION TO MODIFY CONDITIONS OF RELEASE

The Defendant, Marleny Amparo Torres, through the undersigned counsel, hereby moves this Court to modify the Defendant's conditions of release. In support of this request the defendant asks the Honorable Court to consider the following:

1. The Defendant, Marleny Amparo Torres, has been free on conditions of release in this case since December 30, 2013.
2. Upon her release from detention on December 20, 2013, Ms. Torres was placed on electronic monitoring as a condition of her release.
3. Since her release from pretrial detention, Ms. Torres has been in full compliance with all of her conditions of release and has worn the electronic bracelet since that date.
4. Ms. Torres proposes the following additional surety in support of this motion to modify the conditions of her release: Mr. Fabian Cano of 127 Wardwell Street, Stamford, Connecticut 06902. Mr. Cano is currently employed by Leros Limo Company in Hawthorne, New York as a limousine driver earning \$45,000.00 to \$50,000.00 annually.

